

# Exhibit A

## Public-Redacted

**Exhibit A to January 28, 2022 Supplemental Letter Brief re: Search Terms**

| <b>Search Term Number</b>                           | <b>Google's Proposal<br/>(<u>Prior Searches +<br/>Court-Ordered<br/>Searches From 1/20/22</u><br/><u>Plus:</u>)</b> | <b>Plaintiffs'<br/>Proposal</b> |
|---|---|---------------------------------|
| <b>40b</b> (Firebase Cloud Messaging) – Francis Ma  |   |                                 |
| <b>40c</b> (Firebase Cloud Messaging) – Todd Hansen |   |                                 |
| <b>43b</b> – Steven Ganem                           |   |                                 |
| <b>43c</b> – Ma, Monsees, Hansen, Weng              |   |                                 |
| <b>Total<sup>1</sup></b>                            | <b>22,385</b>   | <b>84,858</b>                   |

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<sup>1</sup> Because multiple searches can return the same document, calculated “totals” throughout this exhibit are less than numeric totals for the search terms within each row. In other words, these totals and those highlighted in yellow represent the total number of additional documents for review after accounting for documents that contain multiple search terms.

**40b – FCM**

(Custodian: Francis Ma)

|       |   |            |   |
|-------|---|------------|---|
| 40b   | <i>Plaintiffs' Initial Proposal:</i> (FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR *WAA* OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP) <sup>2</sup> |            | ██████████ <sup>3</sup>                               |
|       | <b>Google's Revised Proposal</b>  |            | <b>Plaintiffs' Revised Proposal</b>                   |
| 40b-1 | (FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR scion OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR “my account” or “my activity” OR conversion* OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)   | ██████████ | Same<br>██████████                                    |
| 40b-2 |   |            | (FCM or “cloud messaging”) /15 firebase<br>██████████ |
| 40b-3 |   |            | (FCM or “cloud messaging”) /15 perform*<br>██████████ |
| 40b-4 |   |            | (FCM or “cloud messaging”) /15 event<br>██████████    |
| 40b-5 |   |            | (FCM or “cloud messaging”) /15 audience<br>██████████ |
|       | <b>Google's Sub-Total</b>   | ██████████ | <b>Plaintiffs' Sub-Total</b><br>██████████            |

<sup>2</sup> Due to system errors, “app\*” was replaced with “app or apps or application or applications”; \*WAA\* was replaced with “WAA\* or sWAA.”

<sup>3</sup> Google has recalculated hit counts to exclude documents the Court ordered Google to review in its January 20, 2022 Order, Dkt. No. 208.

**40c – FCM**

(Custodian: Todd Hansen)

|       |  |  |   |
|-------|--|--|---|
| 40c   | <i>Plaintiffs' Initial Proposal:</i> (FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP) <sup>4</sup> |  |   |
|       | <b>Google's Revised Proposal</b>   |  | <b>Plaintiffs' Revised Proposal</b>     |
| 40c-1 | (FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR “my account” or “my activity” OR conversion* OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)  |  | Same                                    |
| 40c-2 |  |  | (FCM or “cloud messaging”) /5 firebase  |
| 40c-3 |  |  | (FCM or “cloud messaging”) /10 perform* |
| 40c-4 |  |  | (FCM or “cloud messaging”) /10 event    |
| 40c-5 |  |  | (FCM or “cloud messaging”) /10 audience |
|       | <b>Google's Sub-Total</b>  |  | <b>Plaintiffs' Sub-Total</b>            |

<sup>4</sup> Due to system errors, “app\*” was replaced with “app or apps or application or applications.”

## 43b

(Custodian: Steve Ganem)

|       |  |   |   |
|-------|--|---|---|
| 43b   | <i>Plaintiffs' Initial Proposal:</i> (Analytics OR firebase OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) AND (Gold OR app* /5 (event OR interact* OR activity OR measure*)) OR *WAA* OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement OR "Google mobile service" OR GMS OR Clearcut) <sup>5</sup> |   | 6 |
|       | <b>Google's Revised Proposal</b>   | <b>Plaintiffs' Revised Proposal</b>   |   |
| 43b-1 | (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR "my account" OR "my activity" OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement)   | Same  |   |
| 43b-2 |  | Firebase /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR "my account" OR "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement OR "Google mobile service" OR GMS OR Clearcut) |   |
| 43b-3 | (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /5 conversion*   | 43b-4: (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 conversion*  |   |
| 43b-5 |  | (Analytics OR firebase OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 perform*  |   |

<sup>5</sup> Due to system errors, "app\*" was replaced with "app or apps or application or applications"; \*WAA\* was replaced with "WAA\* or sWAA."

<sup>6</sup> Due to an error in the syntax of this search term, Google previously reported a much lower hit count for this proposal. The hit count reflected here reflects a correction in that syntax error, which resulted in a higher hit count.

**43b**

(Custodian: Steve Ganem)

|                           |  |   |  |   |
|---------------------------|--|---|--|---|
| 43b-6                     |  |   | (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 event  | ■ |
| 43b-7                     |  |   | (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 audience                                     | ■ |
| 43b-8                     |  |   | (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 (“Google mobile service” OR GMS OR Clearcut) | ■ |
| <b>Google’s Sub-Total</b> |  | ■ | <b>Plaintiffs’ Sub-Total</b>   | ■ |

|        |  |  |  |  |
|--------|--|--|--|--|
|        | <i>Plaintiffs’ Initial Proposal (1/7/22):</i> (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) AND Gold   |  |  |  |
|        | <i>Plaintiffs’ Revised Proposal (1/28/22):</i> <sup>7</sup> Gold /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* sWAA OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement OR “Google mobile service” OR GMS OR Clearcut) |  |  |  |
| 43b-9  | Gold /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR “my account” or “my activity” OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement)  |  | Same   |  |
| 43b-10 | Gold /5 conversion   |  | Same   |  |
| 43b-11 |  |  | Gold /15 (perform* OR event OR audience OR “Google Mobile Service” OR GMS OR Clearcut) |  |

<sup>7</sup> Plaintiffs proposed adding over 10 new connectors to the search string including “Gold” for the first time on January 28, 2022. Earlier in the day, Google inadvertently offered to employ the term “Gold,” but promptly informed Plaintiffs this was incorrect upon learning of the error. In response, Plaintiffs proposed this new search, most of which Google agreed to employ in the interest of compromise.

**43c**

(Custodian: Monsees, Ma, Hansen, Weng)

|       |  |  |   |  |
|-------|--|--|---|--|
| 43c   | <i>Plaintiffs' Initial Proposal:</i> ("Google Mobile Service" OR GMS OR Clearcut) /10 Gold OR analytics OR GA4F OR firebase OR scion OR "Google Mobile Platform" OR GMP OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR *WAA* OR "my account" or "my activity" OR perform* OR conversion* OR event OR audience OR FCM OR "cloud messaging" or AdMob OR Clearcut) <sup>8</sup> |  |   |  |
|       | <b>Google's Revised Proposal</b>   |  | <b>Plaintiffs' Revised Proposal</b>                       |  |
| 43c-1 | ("Google Mobile Service" OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR "Google Mobile Platform" OR GMP OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR "my account" OR "my activity" OR conversion* OR FCM OR "cloud messaging" OR AdMob)  |  | Same  |  |
| 43c-2 |  |  | ("Google Mobile Service" OR GMS OR Clearcut) /10 firebase |  |
| 43c-3 |  |  | ("Google Mobile Service" OR GMS OR Clearcut) /10 perform* |  |
| 43c-4 |  |  | ("Google Mobile Service" OR GMS OR Clearcut) /10 event    |  |
| 43c-5 |  |  | ("Google Mobile Service" OR GMS OR Clearcut) /10 audience |  |
|       | <b>Google's Sub-Total</b>  |  | <b>Plaintiffs' Sub-Total</b>                              |  |

<sup>8</sup> Due to system errors, "app\*" was replaced with "app or apps or application or applications"; \*WAA\* was replaced with "WAA\* or sWAA."